RECEIVED
CENTRAL FAX CENTER
DEC 13 2006

REMARKS

Applicant wishes to thank the Examiner for considering the present application. In the Office Action dated November 20, 2006, claims 1-10 are pending in the application. Claims 11-19 have been added. Applicant respectfully requests the Examiner for reconsideration of the claims.

Claims 1-3, 5-8 and 10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Adiwoso* (6,067,453) in view of *Izadpanah* (6,560,213). Applicant respectfully traverses.

Claim 1 is directed to a communications system 10 that is best shown in Figure 1. The communications system 10 includes a first teleport station 20 that is described in the second full paragraph of page 4. A first user terminal 16 is also included in Claim 1. The user terminal is set forth in the first full paragraph of page 4. As stated, the user terminals may include various consumer and business-type applications.

Claim 1 further includes a satellite 18 coupling the first teleport station 20 to the first user terminal 16. The satellite is first described in the first full paragraph of page 4. A network access point 21 is directly coupled to the Internet. The network access point is also directly coupled to the first teleport station 20 through an optical fiber 23. The coupling of the teleport station and the network access point is described in paragraph 2 of page 4.

The Examiner states that the Adiwoso reference does not explicitly disclose that the network access point 37 is coupled to the first teleport station through an optical fiber. The Examiner cites the Izadpanah reference for disclosing "a satellite gateway connected via a fiber optic link for connecting to network such as for transmitting internet traffic". The Examiner cites column 3, lines 1-20 for this proposition. The Applicant has carefully reviewed column 3, lines 1-20 and respectfully submits that the teachings missing from Adiwoso are not set forth in these passages of Izadpanah. These specific passages refer to Fig. 1. While it is true that Fig. 1

includes an optical fiber 6 that couples a central node 4 to an access interface point 8, there is no teaching of the type of connection between the central node 4 and the Internet 22. Only a WAN/LAN 20 is set forth. In the embodiment of Fig. 1, the central node 4 may include an input/output device such as a satellite system as set forth in line 18. With that, no separate internet access point is illustrated in Fig. 1 of Izadpanah. The network access point of Claim 1 is not the same as the access interface point of Izadpanah. Claim 1 of the present application specifically recites the direct optical coupling of the teleport station and the network access point. Therefore, the Izadpanah reference fails in two respects: there is no separate network access point directly coupled to the internet and there is no teaching for the type of coupling between a network access point and a teleport station.

In response to the above argument, on pages 3 and 4 of the July 13, 2006 Office Action and in the Final Office Action dated November 20, 2006, the Examiner tries to clarify his rejection. The Examiner cites column 4, lines 1 through 12 to state that the central node of Figure 3 may act as a gateway to the Internet. While this passage does state that the "central nodes 4 ... may also serve as part of ... a gateway to the Internet 22 via broadband fiber optic cable 6", the connection between the central node 4 and the LAN/ WAN 20 is shown as a broadband fiber optic cable. Claim 1 was clarified to recite the direct connections Applicant believes are inherent. The connection between the LAN/WAN 20 and the Internet 22 is not shown. Therefore, there is no teaching or suggestion for providing a direct optical fiber connection between the LAN/WAN 20 and the Internet 22. Therefore, the Izadpanah reference also does not teach "a network access point first teleport station through an optical fiber".

Applicants also respectfully submit that there is no teaching or suggestion for forming the combination of the Izadpanah reference and the Adiwoso reference. The Izadpanah reference is merely a ground-based system. Although a satellite is illustrated in Figure 1, the satellite is

merely used to *receive* information at a central node 4. The rest of the system is a terrestrial-based system. In Figure 3, access internet points 8 communicate via terrestrial millimeter waves with customer interfaces 2. An optical fiber couples the access internet points 8 to the central node 4. The central node 4 is coupled to a LAN/WAN 20 with an optical fiber. The LAN/WAN is then coupled to the Internet 22 with an unknown connection. Claim 1 is directed to a satellite-based system in which a teleport station and a first user terminal are coupled together through a satellite. Thus, claim 1 is reciting a satellite-based system. In Figures 1 and 3 of Izadpanah, there is no teaching of a satellite-based system. Therefore, there is no teleport station. Izadpanah is essentially a ground-based system and, therefore, there is no motivation for the combination of Izadpanah with a satellite system of Adiwoso. Thus, applicants respectfully request the Examiner reconsider the rejection of claim 1 because there is no teaching or suggestion in either reference to form the combination and even if the combination is formed, claim 1 cannot be formed. Therefore, Applicants respectfully request the Examiner for a reconsideration of claim 1.

Claim 3 depends upon claim 1 and recites that the second teleport station is coupled to the first teleport station through the satellite. Neither reference teaches a first teleport station coupled to a second teleport station through a satellite. Because claim 3 further limits claim 1, applicant respectfully submits that claim 3 is also allowable for the same reasons set forth with respect to claim 1.

Claim 5 is an independent claim directed to a method of communicating between a first user terminal and a first geographic region served by a first satellite and a second user terminal in a second geographic region. Claim 5 recites the steps of directing a communication from a first user terminal to the first satellite 18, routing the communication from the first satellite 18 to the first teleport station 20 and routing the communication from the first teleport station 20 to a

second teleport station 20 in the second geographic region by way of an optical fiber network 38. Claim 5 also recites the step of routing the communication from the second teleport station 20 to a second user terminal in the second geographic region. This is generally set forth in the first full paragraph of page 7.

The Examiner points to Figs. 5 and 6 of the Adiwoso reference for disclosing multiple satellite stations connected via fiber links. Applicant respectfully submits that Figs. 5 and 6 merely illustrate a number of satellites above a portion of the earth that illustrate coverage regions. There is no teaching or suggestion in either the Adiwoso reference or Izadpanah reference that directs a communication from a first user terminal to a satellite and then routes the communication from the satellite to a first teleport station then to a second teleport station in a second geographical region by way of an optical fiber network. Adiwoso is merely a satellite-type system. The Izadpanah reference does disclose both a satellite and an optical fiber. However, the optical fiber merely couples a millimeter wave access point to a central node. The user terminals do not communicate directly with the satellite. The customers illustrated in box 2 communicate with the access point using millimeter waves. The millimeter waves are then coupled to the optical fiber and directed to the central node 4. It is the central node that may communicate with the satellite. Therefore, applicant respectfully requests the Examiner to reconsider the rejection of claim 5. Likewise, claim 6, 7, and 8 further limit claim 5 and are also believed to be allowable for the same reasons set forth above. Claim 10 further limits claim 9 and is allowable for the same reasons set forth below.

Claim 2 stands rejected under 35 U.S.C. §103(a) as being unpatentable over *Adiwoso* in view of Izadpanah and in further view of *Wiedeman* (6,160,994). As mentioned above, the Adiwoso reference has various deficiencies admitted to by the Examiner. The Wiedeman reference, although disclosing Ka band communications, does not teach or suggest the network

access point coupled to the first teleport station through an optical fiber. Applicant therefore respectfully requests the Examiner to reconsider the rejection of claim 2 as well.

Claims 1, 3, 5-8, and 10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Dillon* (5,852,721) in view of *Izadpanah* (6,560,213). Applicant respectfully traverses. The Dillon reference teaches that a modem 190 is coupled to an internet 130 via a telephone line 192. As the Examiner correctly points out, there is no teaching in the Dillon reference for a network access point that is coupled to a first teleport station through an optical fiber. As mentioned above, the Izadpanah reference also does not teach or suggest this. Applicant, therefore, respectfully requests the Examiner to reconsider this rejection because of the deficiencies of the Izadpanah reference described above. Likewise, claims 3 and 5-7 are also believed to be allowable for the same reasons set forth above with respect to claim1 due to the deficiencies of the Izadpanah.

Claims 4 and 9 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Dillon* in view of *Izadpanah* and in further view of *Rowe* (6,792,615).

With respect to claim 4, a communication system as recited that includes a satellite, first teleport station, an optical fiber network, and a second teleport station coupled to the first teleport station through the optical fiber network and the satellite. The optical fiber network provides a primary communication link until an irregularity is detected in the optical fiber, where, upon the sensing of the irregularity, the communication is routed from the first teleport station to the second teleport station through the satellite. It should be pointed out that the primary communication recited in Fig. 4 is an optical fiber with the satellite back-up. The Examiner points to Rowe (column 20, lines 50-67) for the back-up feature. However, it is land line back-up for the satellite system that is set forth. Claim 4 specifically recites the optical system as the primary while the back-up system is the satellite system. On page 6 of the Office

Action of July 13, 2006, the Examiner points to column 6, lines 5-60 of the Izadpanah reference for teaching a backup system. Applicant has reviewed this column and can find no teaching or suggestion for providing a backup. Although different forms of communication are described, no teaching of using one as a backup to another is set forth. Applicants respectfully believe that what is provided in the Izadpanah reference in column 6 is alternative methods for communicating but not backup methods. Therefore, applicant respectfully requests the Examiner to reconsider the rejection of claim 4.

Claim 9 was amended above. Claim 9 is also an independent claim directed to a method of operating a communication system. Claim 9 recites "generating a plurality of spot beams directed to a respective plurality of teleport stations from a satellite, interconnecting the plurality of teleport stations with the optical communication network; in normal operating conditions, directing a communication from a first of said teleport stations through said satellite, when the first teleport station is encumbered, directing the communications through an optical link, and, directing the communication to the satellite from the second teleport station."

As mentioned above, the Rowe reference does teach a satellite distribution system and back-up land line 152. The Rowe reference does not teach or suggest spot beams for a respective teleport station. The Rowe reference does not teach or suggest interconnecting a plurality of teleport stations with an optical communication network and using a second teleport station as a back-up to the first teleport station when it becomes encumbered. In fact, there is no teaching or suggestion in the passages set forth by the Examiner for an optical network. Claim 9 specifically recites that when the first teleport station is encumbered, directing the communication through an optical link. Both the Izadpanah and Dillon references do not teach a redundant-type system as set forth in claim 9. The Rowe reference does not teach or suggest the use of an optical fiber.

Therefore, because of these deficiencies, applicant respectfully requests the Examiner to reconsider the rejection of claim 9 as well.

Claim 10 is a further limitation of claim 9 and is believe to be allowable for at least the same reasons as claim 9.

In light of the remarks above, Applicant submits that all objections and rejections are now overcome. The application is now in condition for allowance and expeditious notice thereof is earnestly solicited. Should the Examiner have any questions or comments, the Examiner is respectfully requested to contact the undersigned attorney.

Should any fees be associated with this submission, please charge Deposit Account 50-0383.

Respectfully submitted,

Dated: December 13, 2006

By: _____
Georgann S. Grunebach, Reg. No. 33,179
Attorney for Applicants

The DIRECTV Group, Inc.
CA/LA1/A109
2230 East Imperial Highway
P.O. Box 956
El Segundo, CA 90245
Telephone: (310) 964-4615